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MEMO ENDORSED

April 9, 2021

BY ECF

Honorable Valerie E. Caproni
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: USA v. Stefan He Qin., No. 21-cr-00075 (VEC) (S.D.N.Y.)

Dear Judge Caproni:

I write on behalf of Stefan He Qin, the defendant in the above-captioned matter. With the consent of the government, I respectfully request a 90-day adjournment of Mr. Qin's sentencing, which is currently scheduled to take place on May 20, 2021 at 11:00 a.m. This is Mr. Qin's first request to adjourn his sentencing.

Mr. Qin seeks to adjourn his sentencing so that he can continue assisting the Securities and Exchange Commission (SEC) in its efforts to recover investor funds in connection with the related civil action pending before Judge Schofield, *SEC v. Stefan Qin. et al.*, No. 20-cv-10849 (LGS) (S.D.N.Y.) ("*SEC* Action"). In the *SEC* Action, with Mr. Qin's support and consent, on January 21, 2020, the Court appointed a Receiver over defendants Virgil Capital LLC, Montgomery Technologies, LLC, Virgil Technologies, LLC, Virgil Quantitative Research, LLC and VQR Partners, LLC (collectively, "Entity Defendants") to marshal and preserve recoverable assets for the benefit of investors in the relevant funds. ECF 31, *SEC* Action.

Since the Receiver was appointed in January, Mr. Qin has been working diligently to cooperate with and assist the Receiver in its efforts to recover assets for investors by, among other things, attending weekly three-hour interviews with representatives of the Receiver, SEC, and the U.S. Attorney's Office, and identifying and providing extensive documentary records and

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communications relevant to the Receiver's effort and the SEC's investigation. The Receiver has conveyed that it expects Mr. Qin's continued cooperation going forward will be of great assistance in its efforts to recover assets for investors.

Accordingly, I respectfully request that the Court adjourn the May 21, 2021 sentencing to a date on or about 90 days later. The Government consents to this adjournment request.

Respectfully submitted,



Sean Hecker

cc: Assistant U.S. Attorney Daniel Tracer

Application GRANTED. Mr. Qin's sentencing, which is currently scheduled for May 20, 2021 at 11:00 A.M., is hereby adjourned to **Thursday, August 19, 2021, at 11:00 A.M.** Pre-sentencing submissions are due no later than **Thursday, July 29, 2021.**

The sentencing will be held in Courtroom 443 of the Thurgood Marshall United States Courthouse, located at 40 Foley Square, New York, New York 10007. For information about courthouse entry requirements and for the public dial in information, see the Court's February 5, 2021 Order at docket entry 6.

SO ORDERED.



April 9, 2021

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE